

# MEMO ENDORSED

## GOTTLIEB & ASSOCIATES ATTORNEYS

150 E. 18<sup>th</sup> St., Suite PHR • New York, NY 10003  
Tel (212) 228-9795 • Fax (212) 982-6284  
[NYJG@aol.com](mailto:NYJG@aol.com)

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May 14, 2021

### VIA ECF

The Honorable Valerie E. Caproni  
United States District Judge  
United States District Court  
Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: Williams v. HM.Clause, Inc.,  
Case No.: 1:21-cv-514-VEC

Dear Judge Caproni,

Application GRANTED. The May 21, 2021 IPTC is ADJOURNED to **July 16, 2021, at 10:30 a.m.** The parties' joint letter and proposed Case Management Plan are due not later than **July 8, 2021**. Plaintiff's counsel is warned that additional failures to comply with the Court's orders or Individual Practices may result in sanctions.

SO ORDERED.

  
5/17/2021

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

The undersigned represents Milton Williams, on behalf of himself and all other persons similarly situated ("Plaintiff") in the above referenced matter against Defendant, Garden Trends, Inc., ("Defendant"). The undersigned respectfully requests that the Initial Conference scheduled for May 21, 2021 at 10:00 AM (Dkt. 6) be adjourned for 60 days. The Plaintiff recently filed an Amended Complaint adding Garden Trends, Inc., to this Action (Dkt. 8) and filed a Notice of Voluntary Dismissal as to the prior Defendant HM.Clause, Inc., (Dkt. 11). Garden Trends, Inc., was served on May 11, 2021 and an Affidavit of Service was filed therewith (Dkt. 15). Because the Defendant was recently served; an attorney for the Defendant has not yet appeared in this Action or been in contact with the undersigned. The undersigned apologizes for the lateness of this request and this request will grant ample time for the Defendant to retain counsel and for Defendant's Counsel to appear and discuss a possible resolution with Plaintiff's Counsel.

Thank you for your attention to this matter. Should the Court have any questions, please do not hesitate to contact the undersigned attorney.

Respectfully submitted,

GOTTLIEB & ASSOCIATES

/s/Michael A. LaBollita, Esq.  
Michael A. LaBollita, Esq.

cc: All counsel of record via ECF